

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Manuel Sepulveda Jr.

PRINCIPAL

United States District Court
Southern District of Texas Case Number:

YOB: 1997

FILED

M-19-1377 -M

Celso Ivan Rios-Avalos

CO-PRINCIPAL

United States JUN 12 2019

YOB: 1981

Teodoro Hinojosa Jr.

CO-PRINCIPAL

United States David J. Bradley, Clerk

YOB: 1981

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 10, 2019 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Reina Marisol Mendoza-Coto, a citizen of El Salvador, and Diego Garcia-Buitron, a citizen of Mexico, along with eight (8) other undocumented aliens, for a total of ten (10), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Fronton, Texas to the point of arrest near Fronton, Texas, by means of a motor vehicle,

in violation of Title 8 United States Code, Section(s) 8 USC 1324(a)(1)(A)(ii) FELONY

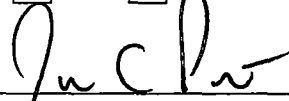
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 10, 2019, Border Patrol Agents working near Fronton, Texas observed a white single cab pickup truck, driven by a male subject, travel south on a private ranch road. This area is known as the Corrals and is highly used by human smugglers to pick up illegal aliens due to its close proximity to the river.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

Approved by: M.H. Nolasco, AUSA
6/12/19

☒ Yes ☐ No


Signature of Complainant

Julio C. Peña Border Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

June 12, 2019
Date

at McAllen, Texas
City and State

J. Scott Hacker, U. S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19- 1377-M

**RE: Manuel Sepulveda Jr.
Celso Ivan Rios-Avalos
Teodoro Hinojosa Jr.**

CONTINUATION:

Agents then observed the single cab pickup truck return back north and leave the area. Shortly thereafter, a four door pickup truck traveled south on the same road and Agents observed the same male subject, from the previous pickup truck, now driving the four door pickup truck. Additionally, Agents observed the driver, later identified as Manuel Sepulveda, a United States Citizen, being accompanied by a male passenger, later identified as Celso Ivan Rios-Avalos, a United States Citizen.

A short time later, Agents observed the four door pickup truck, driven by Sepulveda, going back north at a high rate of speed. Agents gave chase and were able to catch up to the pickup truck before it could leave the ranch. As Agents identified themselves, both Sepulveda and Rios exited the vehicle and attempted to abscond by running south towards the river. After a short foot chase, Agents managed to apprehend both subjects.

At the vehicle, seven (7) subjects were found laying in the bed of the truck and three (3) additional subjects were found inside the cab. All ten (10) subjects were determined to be illegally present in the United States.

Near the scene, Agents observed a male subject, later identified as Teodoro Hinojosa Jr., a United States Citizen, walking by the brush. Hinojosa advised the Agents that his pickup truck got stuck in the mud nearby. Suspecting that Hinojosa could be involved, Agents ran registration checks on his single cab pickup truck and the pickup truck driven by Sepulveda. Checks revealed that both pickup trucks were registered to Hinojosa.

All subjects were transported to the Rio Grande City Border Patrol Station to be processed accordingly.

PRINCIPAL STATEMENT:

Manuel Sepulveda Jr. was read his Miranda Rights. He understood and agreed to provide a sworn statement without the presence of an attorney.

Sepulveda stated he was driving a four door truck in order to pick up four illegal aliens. Sepulveda claims he doesn't know how much he was going to get paid but did it because he needed money. Sepulveda stated he was going to transport the aliens somewhere in Roma, Texas and was accompanied by Rios. Additionally, when he was caught, Sepulveda claimed he saw his friend, later identified as Teodoro Hinojosa Jr., also getting arrested.

Sepulveda identified Rios, through a photo lineup as the passenger that was riding with him.

Sepulveda identified Hinojosa, through a photo lineup as his friend that was arrested.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-1377 -M

**RE: Manuel Sepulveda Jr.
Celso Ivan Rios-Avalos
Teodoro Hinojosa Jr.**

CONTINUATION:

CO-PRINCIPAL STATEMENT:

Celso Ivan Rios-Avalos was read his Miranda Rights. He understood and agreed to provide a sworn statement without the presence of an attorney.

Rios stated he accompanied his friend to go pick up an illegal alien. Rios claims he thought it was "easy" and was going to receive \$500. Once at the pickup location, Rios stated that about 8 subjects boarded their vehicle. Rios claimed he was riding in the ranch with Teodoro before he accompanied his friend to pick up the aliens.

Rios identified Sepulveda, through a photo lineup, as the friend he accompanied to pick up the aliens.

Rios identified Hinojosa, through a photo lineup, as Teodoro.

CO-PRINCIPAL STATEMENT:

Teodoro Hinojosa Jr. was read his Miranda Rights. He understood and agreed to provide a sworn statement.

Hinojosa stated he was at the ranch feeding cows when his vehicle got stuck in the mud. Hinojosa claimed he sold the four door truck to a man from Mexico and doesn't know why it was in the same ranch where he was at. Hinojosa claimed he did not know the two subjects from the four door truck.

MATERIAL WITNESS STATEMENTS:

Reina Marisol Mendoza-Coto and Diego Garcia-Buitron were read their Miranda Rights. Both understood and agreed to provide a sworn statement without the presence of an attorney.

Mendoza, a citizen of El Salvador, stated she made the smuggling arrangements and was to pay \$8,000. After crossing the river, Mendoza stated she boarded the bed of a white truck along with several other subjects. Mendoza claimed the truck sped off and eventually stopped. She observed the driver and the passenger attempt to abscond.

Mendoza identified Sepulveda, through a photo lineup, as the driver of the vehicle.

Mendoza identified Rios, through a photo lineup, as the passenger of the vehicle.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-1377 -M

**RE: Manuel Sepulveda Jr.
Celso Ivan Rios-Avalos
Teodoro Hinojosa Jr.**

CONTINUATION:

Garcia, a citizen of Mexico, stated his family made the smuggling arrangements and was to pay \$10,000. After crossing the river with other subjects, Garcia claimed they waited until a white pickup truck arrived and picked them up. Once they boarded the bed of the truck, Garcia stated he felt the vehicle travel at a fast speed. Garcia claimed the driver and passenger eventually took off after they were caught.

Garcia identified Sepulveda, through a photo lineup, as the driver of the vehicle.

Garcia identified Rios, through a photo lineup, as the passenger of the vehicle.